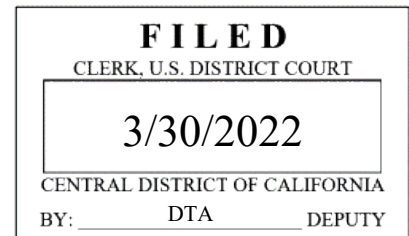


1
2 **UNDER SEAL**



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8 UNITED STATES DISTRICT COURT
9 FOR THE CENTRAL DISTRICT OF CALIFORNIA
10 SOUTHERN DIVISION

11 April 2021 Grand Jury

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 ROBERT MARTINEZ,
16 aka "Lil Rob,"
17 aka "Blacky," and
18 FRANK MOSQUEDA,
aka "Demon,"
aka "Pride,"

19 Defendants.

No. 8:22-cr-00034-CJC

20 I N D I C T M E N T

[18 U.S.C. §§ 924(c)(1)(A)(i),
(ii), (iii): Possess, Use, Carry,
Brandish, and Discharge a Firearm
in Furtherance of, and During and
in Relation to, a Crime of
Violence; 18 U.S.C. § 2(a): Aiding
and Abetting]

21 The Grand Jury charges:

22 [18 U.S.C. §§ 924(c)(1)(A)(i), (ii), (iii), 2(a)]

23 [ALL DEFENDANTS]

24 On or about August 5, 2017, in Orange County, within the Central
25 District of California, defendants ROBERT MARTINEZ, also known as
26 ("aka") "Lil Rob," aka "Blacky," and FRANK MOSQUEDA, aka "Demon," aka
27 "Pride," and others known and unknown to the Grand Jury, each aiding
28 and abetting the other, knowingly used and carried a firearm during

1 and in relation to, and possessed that firearm in furtherance of, a
2 crime of violence, namely, Attempted Murder in Aid of Racketeering,
3 in violation of Title 18, United States Code, Section 1959(a)(5), and
4 in the course of said offense, brandished and discharged a firearm.
5

6 A TRUE BILL

7
8 Foreperson 

9
10 TRACY L. WILKISON
11 United States Attorney
12 

13 SCOTT M. GARRINGER
14 Assistant United States Attorney
15 Chief, Criminal Division

16 DAVID L. JAFFE
17 Chief, Organized Crime and Gang Section
18 United States Department of Justice

19 BENJAMIN R. BARRON
20 Assistant United States Attorney
21 Chief, Santa Ana Branch Office

22 DANIEL AHN
23 GREGORY SCALLY
24 GREGORY STAPLES
25 Assistant United States Attorneys

26 MARIANNE SHELVEY
27 DANBEE KIM
28 Trial Attorneys